

EXHIBIT 2

HONORABLE DAVID G. ESTUDILLO

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

RUTHANNA SHIRLEY, JOHNATHAN
HONE, CARLY PETERS, CHARLES
FRADY, MARCUS SANCHEZ, MORGAN
WINES, SAMUEL KOLB, STEPHEN J.
ANDERSON, THOMAS MOATS,
TRENTON DE BOER, DONALD BRADLEY
ALLEN, JOSHUA BELTZ, ERIC OSWALD,
DREW DELOZIER, LINDA LOPEZ, PAUL
CHERRY, ISAAC STUTES, JULI
ANDERSON,

Plaintiffs,

v.

WASHINGTON STATE DEPARTMENT OF
FISH AND WILDLIFE, a Washington State
Governmental Agency, KELLY SUSEWIND,
an individual, AMY WINDROPE, an
individual, LONNIE SPIKES, an individual,
STEVE BEAR, an individual, CRAIG
BURLEY, an individual,

Defendants.

No. 3:23-cv-05077-DGE

**NOTICE OF DEPOSITION OF
THOMAS MOATS**

TO: THOMAS MOATS

AND TO: NATHAN ARNOLD and R. BRUCE JOHNSTON of ARNOLD & JACOBWITZ
PLLC and DENNIS MCGLOTHIN of WESTERN WASHINGTON LAW
GROUP PLLC

*NOTICE OF DEPOSITION OF THOMAS MOATS - 1
(3:23-CV-05077-DGE)*

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1 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the testimony of
2 THOMAS MOATS will be taken upon oral examination at the instance and request of Defendants
3 in the above-entitled action before a notary public or other person authorized by law to administer
4 oaths and will be recorded by stenographic means. The deposition will be conducted via Zoom
5 Videoconferencing on **January 16, 2025, commencing at the hour of 9:30 a.m.**, said oral
6 examination to be subject to continuance or adjournment from time to time or place until
7 completed, and to be taken on the ground and for the reason that said witness will give evidence
8 material to Defendants' case.

9 DATED this 9th day of January, 2025.

10 HILLIS CLARK MARTIN & PETERSON P.S.

11 By s/Mary Crego Peterson

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25 *Attorneys for Defendants*

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served a true and correct copy of the foregoing document by method indicated below and addressed to the following:

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Of Counsel to Attorney for Plaintiffs

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 9th day of January, 2025, at Seattle, Washington.

HILLIS CLARK MARTIN & PETERSON P.S.

s/Sopheary Sanh

Sopheary Sanh, Legal Assistant
sopheary.sanh@hcmp.com